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November 1, 2022

**VIA ECF**

The Honorable Ona T. Wang  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED.**

**Re: Tiffany Lentz v. ThoughtWorks, Inc., et ano., No. 20 Civ. 7043 (PGG) (OTW)**

Dear Judge Wang:

As counsel for Defendants ThoughtWorks and Kishore Rachapudi in the above-referenced matter, we write with Plaintiff's consent to respectfully request (1) an adjournment of the status conference scheduled for November 3, 2022 at 11:00am until November 18, 21 to 23, or 28 to 30 (with the exception of certain times on those days), as well as a (2) parallel adjournment of the time for the parties' to submit the parties' agenda two days in advance of the conference.

By way of reminder, Defendant previously requested an adjournment of the parties' time to submit the joint agenda in advance of the November 3 conference. However, because of unexpected professional and personal matters that have arisen since Friday, October 28, the undersigned counsel has not been able to prepare the proposed agenda or discuss the underlying issues with Plaintiff. Defendant is also hopeful that an adjournment will also afford the parties additional time to discuss some of the pending issues to reduce the number of matters necessitating the Court's attention at a rescheduled hearing.

An adjournment until November 18 or later is also requested because that is the earliest date all counsel are available. November 8 and November 11, 2022 are Election Day and Veterans Day, respectively. Additionally, through next week, defense counsel has several medical appointments, which require some coordination with respect to scheduling and rescheduling.

For the Court's scheduling convenience, counsel for the parties are available on November 18, 2022 after 10:00am, except from 3:00pm to 4:00pm; November 21 after 10:00am; November 22 after 10:00am; November 23 after 10:00am, except from 12:00pm to 1:30pm; November 28 after 10:00am; November 29 after 10:00am; and November 30, 2022 after 10:30am, except from 12:00pm to 1:30pm and 3:00pm to 4:15pm.<sup>1</sup>

Thank you for your consideration.

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<sup>1</sup> A 30-minute buffer was incorporated into the ranged time restrictions to allow a commute to the courthouse for an in-person conference.

Respectfully submitted,

/s/  
Gary Moy

Cc: Counsel of record (via ECF)

Application **GRANTED**. The status conference previously scheduled for November 3, 2022 is hereby adjourned to **November 18, 2022 at 11:30 a.m.** The parties shall submit a joint agenda in advance of the conference by November 16, 2022.

The Clerk of Court is respectfully directed to close ECF 66.

**SO ORDERED.**



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Ona T. Wang                      11/2/22  
U.S.M.J.